

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
National Radio Systems)	MM Docket No. 99-325
Committee's "In Band On Channel)	
Digital Radio Broadcasting Standard)	
NRSC-5")	

Reply Comments of the International Association of Audio Information Services

The International Association of Audio Information Services (IAAIS) hereby submits these Reply Comments in response to the Commission's Further Notice of Proposed Rulemaking and Notice of Inquiry appended to the Further Notice of Proposed Rulemaking pertaining to Docket 99-325.

The Commission should authorize broadcasters to utilize the entire extended hybrid area and not restrict it to a portion.

We agree with NAB that the Extended Hybrid Partitions should be fully authorized, and while we respect the opinion of Kenwood, IAAIS sees no reason to delay its members entrance to the digital transition by barring them access to a minimum of 25Kbs of Extended Hybrid space – especially in light of the pressure from all parties to keep the main program stream of 96Kbs for the general public's use and not for subscription-based audiences.

Section 255 of the Telecommunications Act applies to HD Radios as interactive telecommunications devices.

We agree with all those who commented that additional audio services will drive the consumer demand for IBOC receivers. IAAIS members nationwide have thousands of hours of content waiting for a broadcast outlet. The millions of Americans with visual impairments will be encouraged to know that the Commission's work to oversee the digital transition includes them. The Commission can do this, not only by insisting that broadcasters who now offer SCA reading services add those reading services to their extended-hybrid partitions, but by insisting that the manufacturers of IBOC radios follow the lead of manufacturers such as Kenwood and

Radiosophy who actively participated with IAAIS in creating an IBOC receiver design that is accessible.

We urge the Commission to note that the CEA suggestion that our insisting that manufacturers make accessible receivers in adherence to Section 255 of the Telecommunications Act of 1996 will somehow slow the development of IBOC units is specious. One of the largest brands of car and home audio equipment, Kenwood, comments on page 4 "... broadcasters can begin supporting reading services in digital under similar conditions as for SCA-based services, with the important exception that receiver manufacturers can add the reading service feature to an IBOC receiver at almost no cost."

Furthermore, more and more electronic equipment that is truly interactive flaunts its inaccessibility with unreadable text displays, remotes that have no feedback for the user, and units which have features that can only be accessed by unmarked or non-tactile buttons. IAAIS is not the only organization which sees the need for better designs. The NAB sees the potential for "more accessible and user-friendly off-the-shelf consumer radios" in reply comments (see NAB Reply, footnote 37, page 11).

Kenwood also states that "As an industry, the receiver makers are planning for multiple supplemental channels." Additionally, CEA in reply, named three manufacturers; Boston Acoustic, Polk Audio, and Radiosophy as having announced plans to introduce IBOC units with multicasting capabilities. This does not indicate a slowing of units to market while awaiting Commission authorization. Designs for these units are worked on well in advance of such announcements. Without the Commission's insistence that the new class of digital radios be accessible to blind and visually impaired Americans, millions of Americans will be prevented from using digital radios. In fact, the National Eye Institute at the National Institutes of Health estimates the US population includes 2.85% or more than 8.2 million people who are blind, legally blind, or visually impaired.¹ IAAIS suggests that to speed consumer adoption of the new technology, all consumers – disabled or not – must have the ability to use the IBOC radios off-the-shelf.

¹ NIH-NEI "Estimated Prevalence Rates of Vision Impairment and Blindness for persons age 40 and older and US Census Quickfacts.

The Commissions' own experience with cellular telephone manufacturers and accessibility are even further evidence that with without government insistence that existing rules be adhered to, manufacturers will not act to be inclusive of people with disabilities. Therefore we reiterate our position and that of Minnesota State Services for the Blind that the new class of IBOC receivers are interactive telecommunication devices and therefore subject to Section 255 of the Communications Act.

Minimum security and simple user interfaces will speed consumer adoption of IBOC radios' secondary program and extended hybrid channel content.

IAAIS affirms the Kenwood statement that minimal security would be needed in the provision of reading services in IBOC if treated as a subscription-based service. Because most of the people using a reading service are visually-impaired, older Americans and less likely to enjoy learning new technology, the simpler the access is, the better. IAAIS members typically do not now charge fees for the reading services, and expect to continue in a digital environment.

The lack of a codec in the standard is not cause to delay authorization

IAAIS wishes to clarify that while there is no audio codec defined in the standard, it supports the use of the HDC codec as a de facto standard under the following conditions: 1.) That use of other codecs in the future are not prohibited by the Commission, and 2.) That reading services are provided enough "digital space" using the existing HDC to deliver service with a substantial improvement in audio quality over the existing analog SCA service.

IAAIS again wishes to thank the Commission for the opportunity to comment on these proceedings.

Respectfully Submitted by,

David W. Noble /s/

Chairman, Digital Radio Subcommittee
Technology Committee – IAAIS

2323 W 14th St
Tempe, AZ 85281

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